## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

ERIC A. GARLAND	)	
Plaintiff,	)	
	) <b>Cause No.: 4:23CV</b>	0064
v.	)	
	)	
	)	
HON. MARY B. SCHROEDER, et al.	)	
Defendants.	)	

## PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED PETITION PURSUANT TO RULE 15

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiff Eric A. Garland moves the Court for leave to file the attached Amended Petition Pursuant to 18 U.S.C. §§ 1961-1968.

Rule 15 provides that "a party may amend its pleading [with] the court's leave" and that "[t]he court should freely give leave when justice so requires." *Fed. R. Civ. P.* 15(a)(2). Allowing Plaintiff to file the proposed Complaint for Civil RICO would be in the interest of justice.

Defendants continue to engage in conspiracies against Plaintiff's rights guaranteed under the U.S. Constitution. Defendants and their co-conspirators have take actions in retaliation for Plaintiff's filing his January 19, 2023 Petition pursuant to 42 U.S.C. § 1983 in this court.

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Defendants' alleged actions under color of law violate certain state and Federal criminal statutes, have been ongoing for many years, continue to this day, and as such, form a pattern of racketeering activity.

For all these reasons, Plaintiff requests that the Court grant Plaintiff leave to file the attached Complaint for Civil RICO pursuant to 18 U.S.C. §§ 1961-1968.

Also attached is a proposed order.

Dated October 9, 2023

Respectfully submitted,

/s/ Eric A. Garland

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 9th day of October, 2023, the foregoing was emailed to the Clerk of the Court to be filed via the Court's electronic filing system and served upon counsel of record, and/or sent via U.S. Postal Service or email to the following:

\_/s/ Eric A. Garland Eric A. Garland

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